

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

SUPERB MOTORS INC., TEAM AUTO SALES LLC,  
ROBERT ANTHONY URRUTIA, 189 SUNRISE  
HWY AUTO LLC, NORTSHORE MOTOR  
LEASING, LLC, BRIAN CHABRIER, *individually and  
derivatively as a member of* NORTSHORE MOTOR  
LEASING, LLC, JOSHUA AARONSON, *individually  
and derivatively as a member of* 189 SUNRISE HWY  
AUTO, LLC, JORY BARON, 1581 HYLAN BLVD  
AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591  
HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD  
AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519  
HYLAN BLVD AUTO LLC, 76 FISK STREET  
REALTY LLC, 446 ROUTE 23 AUTO LLC and  
ISLAND AUTO MANAGEMENT, LLC,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY  
THOMASSON, DWIGHT BLANKENSHIP, MARC  
MERCKLING, MICHAEL LAURIE, THOMAS  
JONES, CPA, CAR BUYERS NYC INC., GOLD  
COAST CARS OF SYOSSET LLC, GOLD COAST  
CARS OF SUNRISE LLC, GOLD COAST MOTORS  
AUTOMOTIVE GROUP LLC, GOLD COAST  
MOTORS OF LIC LLC, GOLD COAST MOTORS OF  
ROSLYN LLC, GOLD COAST MOTORS OF  
SMITHTOWN LLC, UEA PREMIER MOTORS  
CORP., DLA CAPITAL PARTNERS INC., JONES,  
LITTLE & CO., CPA'S LLP, FLUSHING BANK,  
LIBERTAS FUNDING LLC, and J.P. MORGAN  
CHASE BANK, N.A.,

Defendants.

-----X

**Case No.: 2:23-cv-6188 (JMW)**

**DECLARATION IN  
SUPPORT OF MOTION  
TO DISMISS**

ARIEL E. RONNEBURGER, declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney-at-law and am a member of the firm of Cullen and Dykman LLP, attorneys for defendant Flushing Bank (the “Bank”) in the above-entitled action. I am admitted to practice before this Court.

2. I submit this declaration in support of the Bank’s motion to dismiss the First Amended Complaint of plaintiffs Superb Motors Inc., Team Auto Sales LLC, Robert Anthony Urrutia, 189 Sunrise Hwy Auto LLC, Northshore Motor Leasing, LLC, Brian Chabrier, *individually and derivatively as a member of* Northshore Motor Leasing, LLC, Joshua Aaronson, *individually and derivatively as a member of* 189 Sunrise Hwy Auto, LLC, Jory Baron, 1581 Hyland Blvd Auto LLC, 1580 Hylan Blvd Auto LLC, 1591 Hylan Blvd Auto LLC, 1632 Hylan Blvd Auto LLC, 1239 Hylan Blvd Auto LLC, 2519 Hylan Blvd Auto LLC, 76 Fisk Street Realty LLC, 446 Route 23 Auto LLC and Island Auto Management, LLC (collectively “Plaintiffs”).

3. A copy of the First Amended Complaint previously filed in this action is attached hereto as Exhibit “A”. (ECF 65).<sup>1</sup>

4. I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on this 13<sup>th</sup> day of November 2023, at Uniondale, New York.

/s/ Ariel E. Ronneburger

Ariel E. Ronneburger

---

<sup>1</sup> “ECF” references are to the Docket Entries in this matter.